

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In Re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor

PROMESA

Title III

No. 17 BK 3283-LTS

In Re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO
as representative of

THE EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF PUERTO RICO,

Debtor

PROMESA

Title III

No. 17 BK-3566-LTS

**MOTION IN OPPOSITION TO MOTION REQUESTING MODIFICATION OF
MEDIATION ORDER**

TO THE HONORABLE COURT:

COME NOW Iris Rodríguez, through her undersigned attorney and respectfully states as follows:

1. Iris Rodríguez was served with summons and a copy of the complaint in Adversary Proceeding 19-361. On July 24, 2019 the Honorable Court issued a 120-day stay in several adversary proceedings, including this case. The stay ends on November 30, 2019.

2. The Unsecured Creditors Committee now want to continue litigation in certain aspects of the ERS bonds and case 19-361. Movant is a holder of these bonds and objects to the modification of the mediation and stay order. Clearly the Court believed that mediation would help the parties to settle their differences or to narrow the issues. To continue the litigation while the mediation is not the best use of Movant's or the Court's limited resources. Movant recognizes that some bondholders support the modification of the order but these are not parties with limited resources such as Movant.

3. In the COFINA confirmation hearing, various bondholders complained that they were not able to participate in mediation, where many important agreements were reached. The same thing may occur in the litigation intended by the parties and Movant's resources are limited. Nevertheless, Movant wishes to be involved in all aspects of this case in order to defend her bond interests. Movant believes it makes more sense to attempt to solve problems in mediation first rather than to have a two-front controversy in full operation.

WHEREFORE: Ms. Rodríguez opposes the relief requested by the UCC and others and requests that the Court deny the remedy.

Respectfully submitted on this 22nd day of October, 2019.

CERTIFY: That on this same day, the ECF system sent a copy of this motion to all parties in this litigation.

/s John E. Mudd
John E. Mudd
Bar Number: 201102
Attorney for Plaintiffs
LAW OFFICES JOHN E. MUDD
P. O. BOX 194134
SAN JUAN, P.R. 00919
(787) 413-1673
Fax. (787) 753-2202
johnmuddlaw@gmail.com